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July 20, 2025

Via ECF

The Honorable Margaret M. Garnett
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 1007

Re: *Request to Set August 8, 2025 as the Deadline for Plaintiff to Respond to
Flemington Estates, LLC's Supplemental Motion to Dismiss
Range, Jr. v. Flemington Estates LLC et al; Civil Case No: 1:25-cv-02633*

Dear Judge Garnett:

Hanski Partners represents Plaintiff King Range, Jr. in the above-referenced action. We write to respectfully request an extension from July 28, 2025 to August 8, 2025 of Plaintiff's time to respond to Defendant Flemington Estates, LLC's ("Flemington") supplemental motion to dismiss, Dkt Nos. 22 – 23. This is the first request to extend Plaintiff's time to respond to Defendant Flemington's supplemental motion to dismiss. Defendant Flemington consents to Plaintiff's Request. We also respectfully ask the Court to set August 8, 2025 as the date by which Plaintiff must respond to any motion to dismiss filed by Defendant Frankie Shop, LLC ("Frankie") on or before July 25, 2025.

Procedural History

On July 11, 2025, Dkt No. 21, Plaintiff filed an Amended Complaint in response to the motions to dismiss filed by Defendant Flemington, Dkt Nos. 13-15, and Defendant Frankie, Dkt Nos. 16-18. The deadline for Defendants Flemington and Frankie to answer or move to dismiss Plaintiff's Amended Complaint is July 25, 2025. *See* Fed. R. Civ. P. 15(a)(1)(A)(3); Rule II.B.6. of Your Honor's Individual Rules and Practices.

Defendant Flemington responded on July 13, 2025 by filing a supplemental motion to dismiss Plaintiff's Amended Complaint. Defendant Frankie, however, has yet to answer or otherwise respond to Plaintiff's Amended Complaint. As noted above, the deadline for Defendant Frankie to do so is July 25, 2025.

Requested Deadline

Plaintiff respectfully requests that the Court set August 8, 2025 as the deadline for Plaintiff to respond to Defendant Flemington's supplemental motion to dismiss, and to any motion to dismiss that Defendant Frankie files on or before July 25, 2024. Plaintiff requests the August 8, 2025 deadline as it is the date which is fourteen days after Defendants' July 25, 2025 deadline to answer or respond to Plaintiff's Amended Complaint.

Setting Plaintiff's deadline to respond to August 8, 2025 will conserve resources and avoid piecemeal litigation. The August 8, 2025 deadline will allow Plaintiff to respond to Defendant Flemington's motion in a manner tailored to this litigation. Should Defendant Frankie also move to dismiss, Plaintiff can respond to both motions in a consolidated manner. If, however, Defendant Frankie answers Plaintiff's Amended Complaint, Plaintiff will have the ability to respond to Defendant Flemington's motion without the added uncertainty of whether he needs to address additional arguments from Defendant Frankie.

For the reasons set forth above, Plaintiff submits that the proposed August 8, 2025 deadline to respond to Defendant Flemington's motion to dismiss, and any motion to dismiss file by Defendant Frankie on or before July 25, 2025 provides for efficient and orderly motion practice in this action.

Thank you for your time and attention to this matter.

Respectfully,

/s *Adam S. Hanski*

Adam S. Hanski, Esq.